

Secretary, Federal Communications Commission

Washington, DC 20554

ATTN: Wireline Competition Bureau

RE: Section 63.71 Application of Cooperative Light & Power Association of Lake County, Inc. to Discontinue Services

Dear Madam Secretary:

Enclosed please find the Application to Discontinue Services submitted on behalf of Cooperative Light & Power Association of Lake County, Inc. ("Company"). The Company is seeking approval to discontinue certain intrastate, interstate and international interexchange services in its service territory. This filing is made pursuant to Section 214(a) of the Communications Act of 1934, as amended, and 47 C.F.R. §63.71.

A copy of this Application is being sent to the affected state Governor, Public Utilities Commission and the Department of Defense, as provided in Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren

Consultant to Cooperative Light & Power Association of Lake County, Inc.

cc: Kevin Olson - Coop Light & Power file: Coop Light & Power - FCC - Other

tms: FCx1602

SW/sw

Before the FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)		
Section 63.71 Application of)	File No.	
Cooperative Light & Power Association)		
of Lake County, Inc.)		

Section 63.71 Application of Cooperative Light & Power Association of Lake County, Inc.

Cooperative Light & Power Association of Lake County, Inc. ("Cooperative" or "Applicant") hereby seeks authorization, pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and Section 63.71 of the rules of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. §63.71, to discontinue its provision of domestic wireline consumer long-distance services in the state of Minnesota.

Applicant has operated as a reseller of intrastate and interstate interexchange telecommunications services, providing long distance calling services to customers in their service territory in the state of Minnesota. The Applicant's current wholesale long distance provider, Telenational Communications, has notified Cooperative that they will no longer be providing long distance services as of October 1, 2016. As Applicant has presubscribed customers, customer notice is attached.

The applicant provides the following information pursuant to Section 63.71 of the Commission's Rules:

1. Name and address of Carrier

Cooperative Light & Power Association of Lake County, Inc. 1554 Highway 2
Two Harbors, MN 55616
Telephone: (800) 580-5881

Correspondence concerning this application should be sent to:

Sharon Warren, Consultant to
Cooperative Light & Power Association of Lake County, Inc.
Technologies Management, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3005

Facsimile:

407-740-0613

E-Mail:

swarren@tminc.com

2. <u>Date of Planned Service Discontinuance, Reduction or Impairment:</u>

The Applicant proposes to discontinue its provision of the services described above on or after

October 1, 2016, or as soon thereafter as the necessary regulatory approval can be obtained. As

explained below, Applicant relies on the wholesale provision of these services by the underlying

carrier ("Telenational") from whom Cooperative purchases services for resale to its end users. As

a result, once Telenational discontinues the long distance interexchange service offering,

Cooperative will no longer be able to purchase them for resale from Telenational.

3. <u>Points of Geographic Areas of Service Affected:</u>

Cooperative proposes to discontinue the provision of these services in the state of Minnesota.

4. <u>Brief Description of Types of Service Affected</u>:

The service offerings affected by this discontinuance are intrastate, interstate, and international

long distance services. These services provide voice service over the public switched telephone

network (PSTN). These services are provisioned utilizing an underlying wholesale provider,

Telenational Communications. Telenational Communications provided notice to Cooperative

that they will no longer be providing wholesale long distance services effective October 1, 2016.

The proposed discontinuance of these Cooperative services will not harm the affected customers

as there are other alternative service providers in Minnesota that perform essentially the same

function.

5. <u>Brief Description of Dates and Methods of Notice to All Affected Customers:</u>

In accordance with Section 63.71(a), Cooperative provided written notice, by first class mail, to

its affected customers on August 18, 2016. A sample copy of the notice letter provided to

customers is attached hereto as Exhibit A.

6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to Be

Discontinued, Reduced or Impaired:

Applicant is considered non-dominant with respect to the affected services.

In accordance with Section 63.71 of the Commission's Rules and concurrent with the filing of this application, a copy of this Application will be submitted to the Special Assistant for Telecommunications for the Secretary of Defense, the Governor of Minnesota and the Minnesota Public Utility Commission. A service list is provided in *Exhibit B*.

Conclusion

Cooperative respectfully requests that the Commission approve its Section 63.71 Application to discontinue its intrastate, interstate and international interexchange services. The public convenience and necessity will not be adversely affected by the discontinuance of the Cooperative services in question. All customers have been provided notice that affords them ample time to acquire substitute services that are readily available to them. Pursuant to Section 214(a) of the Communications Act of 1934, as amended, and 47 C.F.R. §63.71, Cooperative understands that this application will be automatically granted on the 31st day after Public Notice

is released, with no Commission notification to the Company, unless the Commission notifies the Applicant to the contrary.

Dated this 19th day of August, 2016.

Steven Wattnem

CEO/General Manager

Cooperative Light & Power Association of Lake

EXHIBIT A – CUSTOMER NOTICE



August 18, 2016

Attention LakeNet Communications Long Distance Consumers:

THIS IS IMPORTANT INFORMATION REGARDING YOUR LONG DISTANCE SERVICE. You are receiving this letter because our records indicate you have chosen Cooperative Light & Power Association of Lake County, Inc. ("CLP"), DBA LakeNet Communications ("LakeNet"), as your land-based long distance telephone carrier.

LakeNet is a business unit of CLP, with offices at 1554 Highway 2, Two Harbors, MN 55616. LakeNet is a retail provider of land-based long distance telephone service to consumers in the State of Minnesota.

LakeNet purchases wholesale long distance from Telenational Communications, with offices at 902 W Tyler, Athens, TX 75751. On July 27, 2016, Telenational Communications notified LakeNet that they were exiting the long distance business, leaving LakeNet without a wholesale provider of long distance service. After careful examination of all options available, the CLP Board of Directors agreed to exit the long distance business; therefore, LakeNet will be discontinuing its intrastate, interstate, and international long distance service in the State of Minnesota on or after October 1, 2016.

If you no longer use the LakeNet long distance service, you do not have to take action. **IF YOU DO** use the LakeNet long distance service, you must take action in order to continue using land-based long distance telephone service. If you do not take action, you will not have access to LakeNet long distance service on or after October 1, 2016.

While CLP does not recommend and/or endorse any individual long distance carrier, we do want the transition to your new land-based long distance carrier to be an easy one. We suggest you start by contacting your local telephone service provider for information on their long distance programs. If you currently receive local telephone service from Frontier, you can reach them at (800) 921-8101 for residential service, or (800) 921-8102 for business service. If you currently receive local telephone service from CenturyLink, you can reach them at (866) 963-6665. There is a third party, non-local company we recently learned about by the name of ECG. You can reach them at (888) 869-1141.

If you do use the LakeNet long distance service, you will receive your final billing from CLP during the first week of November. Your prompt attention to clearing up the billing is appreciated.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission

releases public notice of the proposed discontinuance. You may file them electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Cooperative Light & Power Association of Lake County, Inc./LakeNet Communications. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service. Cooperative Light & Power Association of Lake County, Inc./LakeNet Communications Customer Service can be reached at the toll-free number on your bill or V/TTY at 711. Cooperative Light & Power Association of Lake County, Inc./LakeNet Communications, 1554 Highway 2, Two Harbor, MN 55616.

We have appreciated your business, and are sorry for any inconvenience this may have caused you. If you have any questions, please call our offices at (218) 834-2226 or (800) 580-5881.

Sincerely,

Steven M. Wattnem

CEO/ General Manager

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EXHIBIT B – SERVICE LIST

Secretary of Defense Attn: Special Assistant for Telecommunications Pentagon Washington, D.C. 20301

Governor of Minnesota 75 Constitution Avenue St. Paul, MN 55155

Mr. Daniel P. Wolf, Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101

STATE OF FLORIDA		
COUNTY OF ORANGE)	

On this date, August 22, 2016, Notice has been sent to the applicable State Regulatory Agency, Governor's Office and the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in **Exhibit B**.

For Shipping Department

Technologies Management, Inc.